

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

RUSSELL E. GARNER, *
*
Plaintiff, *
*
vs. * CASE NUMBER: 01:06cv781-MHT
*
PROGRESSIVE DIRECT INSURANCE*
COMPANY, *
*
Defendant. *

DEFENDANT'S EXHIBIT LIST

Comes Now, the Defendant, Progressive Direct Insurance Company, by and through undersigned counsel, and does hereby submit the following exhibit list:

- Exhibit 1: Any and all pleadings, including the Complaint filed by the Plaintiff.
- Exhibit 2: Any and all discovery that has been exchanged between the parties, including the Plaintiff's Initial and Supplemental Responses to Defendant's Interrogatories and Requests for Production.
- Exhibit 3: Any and all records related to the Plaintiff's current and/or past employment.
- Exhibit 4: Records of J. Walter Jacobs Ph.D. which are attached as Exhibit 1 to Dr. Jacob's deposition.
- Exhibit 5: Medical Records of Dr. Michelle Turnley which are attached as Exhibit 1 to Dr. Turnley's deposition.
- Exhibit 7 Any exhibit attached as an exhibit to any deposition taken in this case.
- Exhibit 8: Any exhibit listed by the Plaintiff.
- Exhibit 9: Any exhibit necessary for rebuttal or impeachment purposes.

The above-listed exhibits are available for review and inspection by the Plaintiff at the office of counsel for the Defendant. This defendant respectfully reserves the right to amend this exhibit list as needed.

Respectfully submitted this 9th day of March, 2007.

/s/ Alex L. Holtsford, Jr.

ALEX L. HOLTSFORD, JR. (HOL048)
JEFFREY G. HUNTER (HUN028)
Attorney's For Defendant

OF COUNSEL:

NIX HOLTSFORD GILLILAND
HIGGINS & HITSON, P. C.
Post Office Box 4128
Montgomery, Alabama 36103-4128
(334) 215-8585

CERTIFICATE OF SERVICE

I hereby certify that I have this day mailed, postage prepaid, an exact copy of the foregoing document to:

David W. Rousseau
211 W. Adams Street
Dothan, Alabama 36303

This the 9th day of March, 2007.

/s/ Alex L. Holtsford, Jr.
OF COUNSEL